

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE TAXIS FOR ALL CAMPAIGN, a nonprofit
organization, DR. SIMI LINTON, an individual, UNITED
SPINAL ASSOCIATION, a nonprofit organization, 504
DEMOCRATIC CLUB, a nonprofit organization, DISABLED
IN ACTION, a nonprofit organization,

Plaintiffs,

-against-

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, a charter mandated agency, MEERA JOSHI,¹
in her official capacity as chairman and commissioner of the
New York City Taxi and Limousine Commission, THE CITY
OF NEW YORK, and BILL DE BLASIO, as Mayor of the
City of New York,²

Defendants.
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**DEFENDANTS' NOTICE
OF CROSS-MOTION TO
BE RELIEVED FROM
CERTAIN PROVISIONS
OF THE SETTLEMENT
STIPULATION AND
AMENDED
SETTLEMENT
STIPULATION**

11-cv-00237 (GBD)(DF)

PLEASE TAKE NOTICE, that upon the annexed declaration of Michelle Goldberg-Cahn, dated March 6, 2024, the declaration of James DiGiovanni, dated March 6, 2024, and defendant's memorandum of law in support of defendants' cross-motion to be relieved from certain provisions of the Settlement Stipulation and Amended Settlement Stipulation, and in opposition to plaintiffs' motion to enforce the Settlement Stipulation and Amended Settlement Stipulation dated March 6, 2024, the undersigned will cross-move this Court before the Honorable George B. Daniels at the United States District Courthouse for the Southern District of New York, 500 Pearl Street Courtroom 11A New York, New York, for an order relieving defendants of certain

¹ As of May 19, 2022, David Do is Chair and Commissioner of TLC.

² As of January 1, 2022, Eric Adams is Mayor of the City of New York.

provisions of the Settlement Stipulation and Amended Settlement Stipulation, together with such other and further relief as the Court deems just, fair and equitable.

PLEASE TAKE FURTHER NOTICE, that in accordance with Local Rule 6.1(b), opposition papers to this cross-motion shall be served within fourteen days after service of the moving papers, and reply papers shall be served within seven days after service of the answering papers.

Dated: New York, New York
March 6, 2024

HON. SYLVIA HINDS-RADIX
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 356-2199
migoldbe@law.nyc.gov

By: /s/ Michelle Goldberg-Cahn
Michelle Goldberg-Cahn
Samantha Schonfeld
Assistant Corporation Counsel

To: All counsel of record via ECF